

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MAJORIE GASPARD,

Plaintiff,

-against-

Civil Action No:
1:20-CV-02896-AMD-JO

REPLY TO CROSS-CLAIMS

KINGS AUTOSHOW, INC. d/b/a BROOKLYN
MITSUBISHI; GM FINANCIAL d/b/a
AMERICREDIT FINANCIAL SERVICES;
INC. and 'JOHN DOE" a fictitious name for
a party whose real name is unknown,

Defendants.

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Defendant, KINGS AUTOSHOW INC. d/b/a BROOKLYN MITSUBISHI, by and through
their counsel, the Law Offices of C. Fred Weil, as and for its reply to the Cross-Claims of Defendant,
GM FINANCIAL SERVICE d/b/a AMERICREDIT FINANCIAL SERVICES, INC., dated
September 4, 2020, responds as follows:

**AS AND FOR CO-DEFENDANT'S FIRST CROSS-CLAIM
FOR CONTRACTUAL INDEMNITY**

1. Defendant repeats, reiterates and realleges each and every response previously made in the Defendant's Answer to the Complaint with the same force and effect as if fully set forth herein.
2. Denies the truth of the allegation contained in Paragraph 2 of the Complaint and refers the Court to any conclusions of law made therein.
3. Denies the truth of the allegation contained in Paragraph 3 of the Complaint.
4. Denies the truth of the allegation contained in Paragraph 4 of the Complaint.
5. Denies the truth of the allegation contained in Paragraph 5 of the Complaint.

6. Denies the truth of the allegation contained in Paragraph 6 of the Complaint.

**AS AND FOR CO-DEFENDANT'S SECOND CROSS-CLAIM
FOR COMMON LAW INDEMNITY**

7. Defendant repeats, reiterates and realleges each and every response contained in paragraphs "1" through "6" above with the same force and effect as if fully set forth herein.
8. Denies the truth of the allegation contained in Paragraph 8 of the Complaint.
9. Denies the truth of the allegation contained in Paragraph 9 of the Complaint.
10. Denies the truth of the allegation contained in Paragraph 10 of the Complaint.

**AS AND FOR DEFENDANT'S THIRD CROSS-CLAIM
FOR CONTRIBUTION**

11. Defendant repeats, reiterates and realleges each and every response contained in paragraphs "1" through "10" above with the same force and effect as if fully set forth herein.
12. Neither admits nor denies the allegation contained in Paragraph 12 of Plaintiff's Complaint, as they do not call for a response from Defendant, but to the extent that a response may be required, denies each and every allegation therein.
13. Denies the truth of the allegation contained in Paragraph 13 of the Complaint.
14. Denies the truth of the allegation contained in Paragraph 14 of the Complaint.
15. Denies the truth of the allegation contained in Paragraph 15 of the Complaint.

WHEREFORE, Defendant, KINGS AUTOSHOW INC. d/b/a BROOKLYN MITSUBISHI, hereby respectfully requests that this Court issue an Order dismissing the cross-claims of Defendant, GM FINANCIAL SERVICES d/b/a AMERICREDIT FINANCIAL SERVICES and granting Defendant, KINGS AUTOSHOW INC. d/b/a BROOKLYN

MITSUBISHI the costs and counsel fees of this action and such other relief as the Court deems just and proper.

Dated: Syosset, New York
September 24, 2020



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